

EXHIBIT A

(Declaration of Rachel Wise
in Support of Motion)

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9 *Attorneys for Defendant Build Our Center Inc.*

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF NEVADA

12 DREW RIBAR,
13
14 Plaintiff,
15
16 v.
17 WASHOE COUNTY, et al. ,
18 Defendants.

Case No. 3:24-cv-00526-ART-CSD

**RACHEL WISE DECLARATION IN
SUPPORT OF BUILD OR CENTER
INC.'S *EMERGENCY* MOTION
SANCTIONS AND AN ORDER
PROHIBITING PLAINTIFF'S
ONGOING HARASSING AND
THREATENING CONDUCT**

19
20 I, Rachel Wise, hereby declare as follows:

21 1. I am an attorney with the law firm of Gordon Rees Scully Mansukhani, LLP,
22 attorneys for Build Our Center Inc. ("BOC"). If called upon to testify, I could and would
23 competently declare as follows:

24 2. Plaintiff's egregious conduct, harassment, threats, and doxing require the filing of
25 BOC's Emergency Motion for Sanctions and an Order Prohibiting Plaintiff's Ongoing Harassing
26 and Threatening Conduct ("Motion").
27

28 3. In compliance with LR 7-4, this Motion outlines forth (1) the nature of the

1 emergency, (2) the office addresses and telephone numbers of movant and all affected parties,
 2 and (3) an explanation as to why a meet and confer was not possible before the filing of the
 3 Motion.

4 **The Nature of the Emergency**

5 4. I filed my notice of appearance in this matter on November 17, 2025. [Doc. No.
 6 199]. Even before appearing, I have been subject to escalating harassment, threats, and doxxing
 7 from Plaintiff or as a result of Plaintiff doxxing me by posting harassing and threatening videos on
 8 his YouTube channels Auditing Reno 911 and Drew Ribar for Nevada Assembly 40. Each of the
 9 below-referenced videos have been cross-posted to Plaintiff's Facebook page entitled "Auditing
 10 Reno 911" and his Instagram profile entitled "auditreno911." In 50 days, between November 13,
 11 2025 and January 2, 2026, Plaintiff has engaged in extrajudicial harassing or threatening conduct
 12 at least 33 times.

13 5. This Court's previous temporary restraining orders expired on December 5, 2025.
 14 [Doc Nos. 176, 186].

15 6. Plaintiff's most egregious actions occurred on January 1 and 2, 2026, which are
 16 addressed first below. These items are followed by a chronology of Plaintiff's ongoing
 17 harassment, threats, and doxxing throughout and before my, 46-day appearance in this litigation:

18 **I. Plaintiff's Most Egregious Actions as of January 2, 2026**

19 **A. January 1, 2026**

20 7. On January 1, 2026, Plaintiff uploaded a video entitled, "Lawyers Tried to Silence
 21 Me — Here's the Complaint The Filed" to his Auditing Reno 911 and Drew Ribar for Nevada
 22 Assembly 40 YouTube Channels ("Silence Video").¹ **Exhibit F.** The Silence Video includes my
 23

24
 25
 26
 27
 28 ¹ Each video discussed in this Declaration has been posted twice to each of Plaintiff's YouTube Channels.

entire name, place of employment, and image.

8. The description of the Silence Video reads:

In this video, I read and break down the complaint filed against my speech by attorney Rachel L. Wise, step by step, using the actual notice and instructions I received. This video is not a personal attack and does not allege criminal or unethical conduct. It is protected political and journalistic commentary on a matter of public concern involving a lawyer-initiated complaint process and its impact on speech. Viewers will see:

- ✓ What Rachel L. Wise's complaint actually alleges
 - ✓ How complaint mechanisms are used in response to political commentary
 - ✓ Why transparency matters when lawyers engage platform reporting systems
 - ✓ The difference between disagreement and attempts to suppress speech
 - ✓ Why reading the complaint publicly is lawful and important
- Everything discussed is based on documents and notices sent directly to me, which I quote and describe accurately. I encourage viewers to listen to the language themselves and draw their own conclusions.

Ex. F.

9. Throughout the Silence Video, Plaintiff: (a) discussed a December 18, 2025, cease and desist letter (**Exhibit C**); (b) addressed a written communication that Plaintiff sent to my "bosses" (**Ex. F**, timestamp 3:36-3:52 and **Exhibit B**); (c) explained that he lodged a complaint against me with the Nevada Secretary of State (**Ex. F**, timestamp 4:20-5:24); (d) referenced corrupt law firms (**Ex. F**, timestamp 7:26-7:34); and (e) threatened that attorneys need to stop screwing with him. (**Ex. F**, timestamp 10:21-10:24).

10. Plaintiff's Silence Video generated a number of comments including, but not limited to, (a) "A Word to the Wise' get a refund on your law degree", (b) "Time to Sue the Lawyers for Federal Civil Rights Violation by filing False YouTube Complaints. Also Send Alphabet Inc. (Parent Company of YouTube) 1600 Amphitheatre Parkway in Mountain View, California a Letter about these Public Employees that are putting in the False Complaints and

1 YouTube is NOT doing their Due Diligence on the False Privacy Complaints by Public
 2 Employees. There is nothing Private when someone does a News Story on Public Officials in the
 3 Line of their Duties in Public. Contact all Nevada YouTubers and do a Class Action Lawsuit”,
 4 (c) “File a Bar complaint if you haven’t already. Attorneys depend on the fact that the public
 5 thinks they have some sort of authority. They do not. They are stooges who have paralegals
 6 shuffle paper in an unnecessarily complex filing system we call our courts/justice system. The
 7 Bar will reject the complaint (cronyism), however, any complaint is not good for her
 8 Professional Liability Insurance”, and (d) “Happy New Year’s Drew. Make sure that you get
 9 them coins out of them.. They should not have there business online.”
 10

11 11. On the same day, Plaintiff sent an email to the co-managing partners of GRSM’s
 12 Reno and Las Vegas offices claiming, “Ms. Wise is currently utilizing firm resources to engage
 13 in a campaign of administrative harassment and election interference against my First
 14 Amendment activities as a candidate for public office.” **Ex. B.** In that email, Plaintiff threatened
 15 to (a) file a bar complaint against me and (b) file a lawsuit against me. **Ex. B.**
 16

17
 18 **B. January 2, 2026**

19 12. On January 2, 2026, I received a communication from the email address
 20 “bobbyraysmith99@gmail.com” that stated, “Everyone knows where you work and now
 21 everyone knows where you live” (“Threatening Email”). **Exhibit E.** The author of the also
 22 threatened to show up at the front door of my personal residence “so your neighbors will see
 23 what kind of piece of trash you are.” **Ex. E.** I did not respond to the Threatening Email.
 24

25 13. The metadata from the Threatening Email indicates that it was sent through a
 26 server in Ireland, while Plaintiff’s emails indicate that they were sent through a server in
 27 California. However, the originating IP address and the path it travels from sender to receiver
 28

1 can be altered through a VPN² or web-based email services.

2 14. Notably, the time zone from which an email is sent is set by the sender's device
3 and is not masked by VPN or web-based email servers. Here, there is one important similarity
4 between Plaintiff's previous emails to me and the Threatening email: They were all initiated at
5 "-0800 (PST)" coordinated universal time ("UTC"). This shows that the Threatening Email and
6 Plaintiff's previous emails all originated from a device set to the same time zone—Pacific Time.
7 Thus, the UTC metadata from the Threatening Email, which is set by the sender's device and not
8 altered by a VPN or web-based email services, shows that it actually originated in the Pacific
9 Time Zone.
10

11 15. On the same day, I sent the Threatening Email for an internal TLO and Westlaw
12 search to identify the sender. Neither service provided any results for the source of the email
13 address. The internal services opined that the email address was likely created recently.
14

15 16. As a result of Plaintiff's course of conduct on January 1 and 2, 2026, I took the
16 following steps to secure my, my family, and GRSM employees' health and safety:
17

18 a. I filed an IC3 complaint with the Federal Bureau of Investigation ("FBI")
19 referencing Plaintiff's email to the co-managing partners and the Threatening Email. I
20 included all relevant metadata in this complaint.

21 b. I contacted the Las Vegas Metropolitan Police Department ("LVMPD")
22 and requested and increased police patrol presence around GRSM's Las Vegas office.
23

24 c. I filed a harassment report with the Reno Police Department ("RPD") and
25 requested an increased patrol presence around GRSM's Reno office.

26 d. I requested an increased police patrol presence around my home from the
27

28 ² A VPN is a "virtual private network" that uses encryption to change the originating IP address and mask the path an email takes from the sender to the receiver (*i.e.*, the SMTP).

1 appropriate police department.

2 e. I contacted my siblings, in-laws, and elderly parents to advise them that
3 Plaintiff was a threat to their health and safety. I advised them about their options if they
4 are approached, harassed, threatened, or otherwise contacted by Plaintiff. I encouraged
5 them to obtain a data scrubber for the internet that will remove their personal information
6 as a way to mitigate any harm from Plaintiff or his doxxing efforts.

7 f. I updated my husband and cautioned him that he needs to remain aware of
8 his surroundings.

9
10 17. The result of Plaintiff's January 1, 2026, email to co-managing partners and the
11 Threatening Email was for GRSM to:

12 a. alert building security and warn all attorneys and staff that Plaintiff is a
13 potential threat to their health and safety;

14 b. implement protective protocol regarding unknown personnel in the office
15 and handling mail items; and

16 c. advise their lawyers and staff to contact the police immediately if they see
17 Plaintiff near or in the GRSM offices.

18
19 18. As for me personally, the co-managing partners provided me with the option to
20 move to another residence to prevent Plaintiff from killing me or causing me severe bodily
21 injury.

22
23 19. Plaintiff's harassment, doxxing, and threats are intentional and have caused
24 emotional distress to me and my family. Whether Plaintiff sent the Threatening Email himself, or
25 it is the result of Plaintiff doxxing me, the result is targeted harassment and threats arising from
26 Plaintiff's course of conduct. These events have exacted a heavy emotional toll, disrupting daily
27 routines, straining familial well-being, and necessitating extraordinary precautions that would
28

1 have been unnecessary but for Plaintiff's actions.

2 **II. Remaining Chronology of Events**

3 **A. November 13, 2025**

4 20. On November 13, 2025, Plaintiff uploaded a video entitled "Lying and Attacking
5 Corrupt District Attorneys" to his Auditing Reno 911 and Drew Ribar for Nevada Assembly 40
6 YouTube Channels ("Corrupt Attorney Video"). **Exhibit L.** The Corrupt Attorney Video
7 includes my entire name, place of employment, and image.
8

9 21. The description of the Corrupt Attorney Video reads, "Washoe County District
10 Attorney Lying Lindsay Liddell is exposed along with Attacking Amos Stege who attacked me
11 in an elevator..." **Ex. L.**
12

13 22. Throughout the Dec. 20 Video, Plaintiff: (a) shows a letter that he sent to the state
14 bar against BOC's counsel, Alison Kertis (**Ex. L**, timestamp 7:02); (b) calls D.A. "lying Lindsay
15 Liddell" (**Ex. L**, 12:46, 15:29); (c) claims that Alison Kertis had her employees submit fake
16 affidavits (**Ex. L**, 14:24); (d) after saying my co-counsel are afraid of Plaintiff, he taunted me to
17 discuss the case (**Ex. L**, 19:56-24:07); and (e) implied that I am corrupted and that my
18 membership on the Southern Nevada Disciplinary Committee is why Plaintiff's bar complaints
19 against defense counsel were rejected. (**Ex. L**, 30:52-31:52).
20

21 **B. December 18, 2025**

22 23. On December 18, 2025, BOC sent Plaintiff a Cease and Desist Demand
23 ("Demand") demanding that he cease and desist from referencing, displaying, using the name of,
24 or harassing counsel in this matter on any of his social media platforms. **Ex. C.**
25

26 24. On the same day, Plaintiff sent me an email seeking legal advice about the Cease
27 and Desist Demand. **Exhibit D.** He included Joe Hart News 4 and Mark Robison on the email.
28

Ex. D.

1 25. I did not respond to Plaintiff's email.

2 **C. December 19, 2025**

3 26. On December 19, 2025, Plaintiff sent me an email seeking legal advice about the
4 Cease and Desist Demand. **Ex. D.** He included Joe Hart News 4 and Mark Robison in the email.
5 **Ex. D.**

6 27. I responded, "Mr. Ribar: We cannot provide you with legal advice. If you have
7 questions about the facts and law, please contact independent counsel." **Ex. D.**

8 28. In less than an hour, Plaintiff sent me another email seeking legal advice about the
9 Cease and Desist Demand. **Ex. D.**

10 29. I did not respond again.

11 **D. December 20, 2025**

12 30. On December 20, 2025, Plaintiff uploaded a video entitled, "CEASE & DESIST
13 FREE SPEECH!!" to his Auditing Reno 911 and Drew Ribar for Nevada Assembly 40 YouTube
14 Channels ("Dec. 20 Video"). **Exhibit K.** The Dec. 20 Video includes my entire name, place of
15 employment, and image.

16 31. The description of the Dec. 20 Video reads:

17 Attorney Rachel L Wise Senior Counsel with Gordon Rees Scully
18 Mansukhani that trademarks the name "Your 50 State Law Firm"
19 sent me a cease and desist order to stop me from speaking about
20 public issues related to their client Our Center of Reno whose
21 corporate non profit 501 c3 name is Build Our Center. Build Our
22 Center worked with Washoe County to take over public libraries
23 and lock out people they did not want to let in. Our Center also
24 works with the City of Reno and a "banned list" of certain people
25 that are not permitted to use public streets and access public areas
26 during certain events that Our Center believes it controls. Now Ms.
27 Wise does not want me to talk about certain things, although she
28 refuses to identify exactly what those things are... All content in
 this video is based on public records, public law firm profiles, and
 commentary on matters of public concern. No private information
 is shared. Commentary is provided under Fair Use and protected

free speech. If you would like to support me you can venmo donations to [omitted].

Ex. K.

32. Throughout the Dec. 20 Video, Plaintiff (a) generally reads through the cease and desist letter (**Ex. K.**, timestamp 4:34-5:37, 22:14-22:50, 25:11-26:41, 27:26-28:21, 35:59-36:18, 38:49-39:18, 48:16); (b) claims Ms. Kertis lied or had her employees lie (**Ex. K.**, timestamp 5:44-6:00, 17:09-17:16); (c) displaying a privileged communication (**Ex. K.**, timestamp 12:32-13:16, 14:46-14:53); (d) explained that he is always careful with what he says (**Ex. K.**, timestamp 24:16-24:23); (e) referred to the cease and desist letter as fake (**Ex. K.**, timestamp 30:20); (f) referenced the emails Plaintiff sent to me and my response (**Ex. K.**, timestamp 49:09-49:23, 50:23-50:35); and (g) admitted to re-posting offending videos on Facebook, Instagram, and Tik Tok **Ex. K.**, timestamp 59:24-59:31).

E. December 21, 2025

33. On December 21, 2025, Plaintiff uploaded a video entitled, “Pro Se vs 6 Attorneys” to his Auditing Reno 911 and Drew Ribar for Nevada Assembly 40 YouTube Channels (“Pro Se Video”). **Exhibit J.** The Pro Se Video includes my entire name and place of employment.

34. The description of the Pro Se Video reads:

Drew Ribar is pro se vs 6 attorneys... Why do they need so many professional attorneys to defend against me?? Did Alison Kertis and her employees lie to the court about me?? What is more accurate phone gps location data or affidavits sworn out by 2 employees of a law firm?? Want to help me fight? Make a contribution that will help me with the legal fund to make government serve the people.

Ex. J.


35. Throughout the Pro Se Video, Plaintiff (a) talks about the cease and desist letter (**Ex. J.**, timestamp 0:14-0:37); (b) says that co-counsel Alison Kertis “had some of her

employees write affidavits about me that are false” or lie (**Ex. J**, timestamp 1:42-1:53, 11:31-11:52); (c) addresses me while going over Plaintiff’s purported evidence in the lawsuit (**Ex. J**, timestamp, 2:44-3:26, 7:04-7:17); (d) said lawyers “make up a bunch of other fake issues” (**Ex. J**, timestamp, 7:25-7:36); and (e) addressed me to address the merits of the case (**Ex. J**, timestamp, 22:31-23:20).

F. December 22, 2025

36. On December 22, 2025, Plaintiff uploaded a video entitled, “Attorneys Try to take down my videos” to his Auditing Reno 911 and Drew Ribar for Nevada Assembly 40 YouTube Channels (“Take Down Video”). **Exhibit I**. The Pro Se Video includes my entire name, place of employment, and image.

37. The description of the Take Down Video reads:

Rachel Wise of Gordon Rees Scully Mansukhani 50 state lawfirm is trying to take down my videos. Why won't she just talk about the issues instead of trying to hide the documentation?? Here is a link to the video Ms. Wise is trying to take down. 

• [CEASE & DESIST FREE SPEECH!!](#) Help me with my legal fight donate to me on venmo [omitted]. Or if you want to donate to my political campaign you can donate here [omitted].

Ex. I.

38. Throughout the Take Down Video, Plaintiff (a) tells his viewers that they “should probably think about not using [GRSM] ever” (**Ex. I**, timestamp, 15:13-15:17); (b) regarding GRSM, asks his viewers, “Why would you want to support people like this that despise our Constitution?” (**Ex. I**, timestamp, 15:19-15:21); and (c) calls me and GRSM “pieces of shit” (**Ex. I**, timestamp, 15:31).

39. On the same day, Plaintiff sent me an email claiming that a privacy complaint Plaintiff received on his YouTube videos meant that (a) I violated numerous rules of professional conduct, (b) I am liable for abuse of process, and (c) I violated the anti-SLAPP protections under

1 NRS 41.637. **Ex. D.** Plaintiff demanded that I withdraw any privacy complaints he received and
 2 cease extrajudicial actions to protect myself and my family. **Ex. D.** If I failed to comply with his
 3 demands, Plaintiff threatened to (a) file a bar complaint against me, (b) report BOC to the IRS,
 4 and (c) file a lawsuit against me. Plaintiff included co-counsel, Ms. Kertis, Joe Hart News 4,
 5 Mark Robison, and Mark Wlaschin in the email.

6
 7 40. I responded:

8 Mr. Ribar:

9 Please refer to the cease-and-desist letter, which explains the
 10 consequences of noncompliance. We will not acknowledge any
 11 further informal correspondence on the matter. Direct any future
 12 questions or concerns to your own legal counsel.

13 **Ex. D.**

14 **G. December 24, 2025**

15 41. On December 24, 2025, Plaintiff uploaded a video entitled, “Attorneys Fight
 16 Against the Constitution” to his Auditing Reno 911 and Drew Ribar for Nevada Assembly 40
 17 YouTube Channels (“Constitution Video”). **Exhibit G.** The Constitution Video includes my
 18 entire name, place of employment, and image.

19 42. The description of the Constitution Video reads:

20 Gordon Rees Scully Mansukhani Your 50 State Law Firm
 21 Attorney Rachel Wise out of Las Vegas Nevada sends cease and
 22 desist and wants me to stop talking about public records... Then all
 23 of a sudden my videos are getting privacy strikes from You Tube. I
 24 do not recommend hiring attorneys that fight against Constitutional
 25 Rights. 🗣️ New to streaming or looking to level up? Check out
 26 StreamYard and get \$10 discount! 🥰 [omitted]

27 **Ex. G.**

28 43. Throughout the Constitution Video, Plaintiff (a) accuses Ms. Kertis of lying to the
 court (**Ex. G**, timestamp, 0:50-1:29); (b) discusses me and the cease and desist letter (**Ex. G**,

1 timestamp, 1:41-2:01); (c) recognizes that the cease and desist letter requires Plaintiff to stop
2 displaying my name and otherwise harassing me (**Ex. G**, timestamp, 2:59-3:13); (d) contends
3 that I am not upholding the constitution (**Ex. G**, timestamp, 7:17-7:49); and (e) displayed my
4 partner, Craig Mariam's, name, address and image (**Ex. G**, timestamp, 10:21-12:04).

5 44. Plaintiff also uploaded a video entitled "Unaccountable Attorneys" to his
6 Auditing Reno 911 and Drew Ribar for Nevada Assembly 40 YouTube Channels ("Attorney
7 Video"). **Exhibit H**.

8 45. The description of the Attorney Video states, "Are attorneys accountable?? Does
9 the Nevada Bar do anything?? Does it refuse 9 out of 10 complaints from the public?? How can
10 we make government serve the people?? Not the people serving the government!!" **Ex. H**.

11 46. Throughout the Attorney Video, Plaintiff (a) alleges that the Nevada State Bar
12 will not respond to any bar complaints (**Ex. H**, timestamp, 1:10-9:51); (b) claims Ms. Liddel and
13 Ms. Kertis lied to the court (**Ex. H**, timestamp, 1:10-1:41); and (c) admitted that he was in a
14 courtroom recording the court (**Ex. H**, timestamp, 3:09-3:15).

15 Office Addresses and Telephone Numbers

16 47. The office addresses and telephone numbers of the movant and all affected parties
17 are as follows:

- 18 a. **Movant:** c/o Gordon Rees Scully Mansukhani, LLP, 300 South 4th St., Suite
19 1550, Las Vegas, NV 89199, (702)577-9316 and Sierra Crest Business Group,
20 6770 Soth McCarran Blvd., First Floor, Reno, Nevada 89509, (775)337-5700
- 21 b. **Plaintiff:** Drew Ribar, 3480 Pershing Ln. Washoe Valley, NV 89704, (775)223-
22 7899
- 23 c. **Co-Defendants:** c/o District Attorney's Office, 1 South Sierra Street, Reno, NV
24 89501, (775)337-5700

25 ///

The Emergency Precludes a Meet and Confer

48. Due to the threats of harm, doxxing, and ongoing harassment, a meet and confer will further endanger counsel and their clients.

49. Therefore, the state of the emergency precludes a meet and confer under LR 7-4.

Document Authentication

50. Attached to the Motion as Exhibit B is a true and accurate copy of the Jan. 1, 2026, email from Plaintiff to GRSM.

51. Attached to the Motion as Exhibit C is a true and accurate copy of the December 18, 2025, Cease and Desist Letter to Plaintiff.

52. Attached to the Motion as Exhibit D is a true and accurate copy of the Email String from Ribar to Counsel Re: Cease and Desist Demand that ranges December 18, 2025 to December 22, 2025.

53. Attached to the Motion as Exhibit E is a true and accurate copy of the January 2, 2026, Threatening Email from Bobby Smith to me.

54. The following exhibits are true and accurate copies of the videos Plaintiff has posted on his “Auditing Reno 911” and “Drew Ribar for Nevada Assembly 40” YouTube Channels. Each of the following documents will be submitted to the Court via manual filing. The jumpdrive will also include a transcript of the videos generated by YouTube:

- a. Plaintiff’s January 1, 2026, YouTube video entitled “Lawyers Tried to Silence Me — Here’s the Complaint The Filed”
- b. Plaintiff’s December 24, 2025, YouTube video entitled “Attorneys Fight Against the Constitution”
- c. Plaintiff’s December 24, 2025, YouTube video entitled “Unaccountable Attorneys”

1 d. Plaintiff's December 22, 2025, YouTube video entitled "Attorneys Try to take
2 down my videos"

3 e. Plaintiff's December 21, 2025, YouTube video entitled "Pro Se vs 6 Attorneys"

4 f. Plaintiff's December 20, 2021, YouTube video entitled "CEASE & DESIST
5 FREE SPEECH!!"

6 g. Plaintiff's November 13, 2025, YouTube video entitled "Lying and Attacking
7 Corrupt District Attorneys"

8
9 I declare under penalty of perjury under the laws of the state of Nevada that the foregoing
10 is true and correct.

11 Executed this 5th day of January, 2026.

12
13 /s/ Rachel Wise

14 Rachel Wise
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